

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

**SEALED**

USDC - BALTIMORE  
25 APR 23 PM 4:15

UNITED STATES OF AMERICA

v.

WARREN WILLIAMS,

Defendant

Crim. No. MJM 25cr121

Filed Under Seal

**MOTION TO SEAL**

The United States of America, by and through undersigned counsel, respectfully moves this Court for an order sealing the indictment, arrest warrants, and related materials in the above-captioned matter until further order of the Court, and in support thereof states:

1. The Drug Enforcement Administration is currently conducting an ongoing investigation into drug trafficking organizations involving the above-described defendant and others.

2. The targets of the investigation, including the defendant in this matter, are not fully aware of the nature and scope of the investigation.


3. Disclosure of the Indictment at this time could seriously jeopardize the investigation, as it would reveal names and identities of individuals related to this ongoing investigation. Disclosure of the Indictment at this time could alert the defendants to the existence of these charges, giving them incentive and opportunity to flee and attempt to hide from investigators attempting to execute arrest warrants, as well as to destroy evidence or otherwise obstruct justice prior to their arrest. Therefore, disclosure of the Indictment at this time may compromise the integrity of the investigation and could quite possibly jeopardize the outcome of the ongoing investigation and prosecution.

4. To support a motion to seal, the government must demonstrate that: (1) there is a compelling government interest requiring materials to be kept under seal and (2) there is no less restrictive means, such as redaction, available. *In re Search Warrants Issued on April 26, 2004*, 353 F. Supp. 2d 584 (D. Md. 2004). The procedures for sealing are set forth in *Baltimore Sun Co. v. Goetz*, 886 F.2d 60 (4th Cir. 1989). “The judicial officer may explicitly adopt the facts that the government presents to justify the sealing . . . .” *Id.* at 65. This motion and the Court’s reasons for sealing should also be sealed. *Id.* Notice of the sealing is required, but the notice requirement is satisfied by the docketing of the order sealing the documents. *Id.*

WHEREFORE, the government respectfully requests that the Indictment, arrest warrants, and related documents in this case, along with this motion and the Court’s reasons for sealing, be placed under seal until further order of the Court.

Respectfully submitted,

Kelly O. Hayes  
United States Attorney

By:   
James Wallner  
Assistant United States Attorneys